

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

T-M VACUUM PRODUCTS, INC.,

PLAINTIFF

VS.

TAISC, INC., d/b/a GLOBALEASE
SOLUTIONS,

DEFENDANT

CASE NO. 07-4108

PLAINTIFF'S AMENDED NOTICE OF INTENTION TO TAKE ORAL DEPOSITION
IN AID OF JUDGMENT, INCLUDING REQUEST FOR PRODUCTION OF DOCUMENTS

To: TAISC, Inc., d/b/a GlobaLease Solutions, Defendant, by and through its attorneys of record,
Thomas G. Bousquet, Bousquet & Divine, 9225 Katy Freeway, #103, Houston, Texas 77024,
Facsimile (713) 827-0096

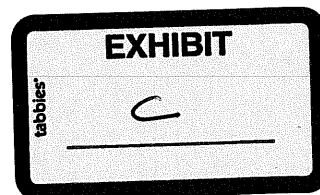
Please take notice that T-M Vacuum Products, Inc., Plaintiff, will take the oral deposition
of John B. Berry, President of Defendant TAISC, Inc., d/b/a GlobaLease Solutions (herein
"GlobaLease"), on **Wednesday, October 29, 2008**, commencing at **9:30 a.m.**, and continuing until
completed.

In accordance with Defendant's request, this deposition will be taken at the offices of
Defendant's attorneys: Bousquet & Divine, 9225 Katy Freeway, #103, Houston, Texas 77024.

This deposition will be taken pursuant to Fed.R.Civ.P. 69(a)(2) and Tex.R.Civ.P. 621a. The
deposition will be taken before an officer authorized to administer oaths, and it will be recorded
stenographically.

Mr. Berry and GlobaLease are instructed to produce, at the time and place of the taking of
this deposition if not prior thereto, for examination and copying in conjunction with the taking of
the deposition, the following documents:

1. All documents relating to any lease payment or payments made or received under
that certain Cross Border Equipment Lease Agreement No. 05-465402 ("Lease Agreement"), dated



October 25, 2005, between GlobaLease (as lessor) and Ulba Metallurgical Plant Joint Stock Company (“Ulba”)(as lessee). This request includes, but is not limited to, all documents regarding any wire transfer, wire payment, bank draft or other payment of any kind under the Lease, whether received from Ulba, Kazkommertsbank, or any other party.

2. All documents relating to the sale, assignment or transfer of any rights or payments under the Lease, including any rights to receive payments from Ulba, Kazkommertzbank or any other party. This request includes, but is not limited to, all documents relating to any assignment of such rights or payments by GlobaLease to Wells Fargo HSBC Tade Bank, N.A.

3. All documents relating to the payments or other consideration made by or for the assignee of such rights or payments under the Lease, including all documents evidencing or concerning any payments or other consideration received by GlobaLease in connection with the assignment of payments or rights under the Lease. This request includes, but is not limited to, all documents regarding or reflecting any wire transfer, wire payment, bank draft or other payment of any kind in connection with the assignment.

4. All documents that evidence or relate to the uses or disposition of the payments or other consideration received by GlobaLease in exchange for an assignment of payments or rights under the Lease.

5. All monthly and annual statements, issued for or during the period from January 1, 2004, to the present, with respect to any account at any bank, brokerage or other financial institution, with respect to any account in the name GlobaLease.

6. All monthly and annual statements, issued for or during the period from January 1, 2004, to the present, with respect to any account at any bank, brokerage or other financial institution, with respect to any account in which funds or property were held for or on behalf of GlobaLease.

7. All income tax and any other tax returns filed by GlobaLease for the years of 2004 through 2007.

8. If a federal tax return has not been filed for any of the years from 2004 through 2007,

any drafts or unfiled copies of such return.

9. All financial statements or other documents reflecting or reporting the net worth or income of GlobaLease at any time during the period from 2004 to the present. This includes, but is not limited to, all financial statements and other financial information regarding GlobaLease that were provided to Wells Fargo Bank, N.A., Wells Fargo HSBC Trade Bank, N.A., or any other Wells Fargo affiliate.

10. If GlobaLease owns or has an interest in any real property, the deed to that property and all mortgages and other liens on such property.

11. If GlobaLease has sold or transferred any real property or interest in real property since January 1, 2004, all documents that evidence or relate to such sale or transfer.

12. All documents that evidence or relate to payments made by GlobaLease to or for the benefit of Mr. Berry since January 1, 2004, including all salary, bonus, dividends, expense reimbursements and other payments of all kinds. This includes, but is not limited to, all IRS forms (including W-2 forms) prepared with respect to such payments.

13. All appraisals or other documents that evidence valuations of any real property or any tangible or intangible personal property owned by GlobaLease at any time from January 1, 2004, to the present.

14. All documents that evidence or reflect debts owed by GlobaLease at this time, including all promissory notes, mortgages and liens regarding such debts.

15. All documents that evidence or concern any account receivable or other sum owed to GlobaLease, including all promissory notes, mortgages and liens regarding such receivables.

16. All shares of stock, bonds, and other certificates or other documents that evidence GlobaLease's interest in any other corporation or in any company, partnership, or joint venture.

17. All insurance policies in which GlobaLease has an interest or that insure property in which GlobaLease has an interest.

18. All insurance policies purchased by GlobaLease or for which premium payments

have been made by GlobaLease.

19. The original bylaws and articles of incorporation of GlobaLease, as well as any amended versions that have been filed.

20. All minutes of the board of directors meetings of GlobaLease, from the date of incorporation to the present.

21. All minutes of shareholders meetings of GlobaLease from the date of incorporation to the present.

Respectfully submitted,

151

H. Miles Cohn
Texas Bar No. 04509600
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Houston, Texas 77002-6420
Telephone: (713) 374-7020
Facsimile: (713) 374-7049
ATTORNEYS FOR T-M VACUUM PRODUCTS,
INC., PLAINTIFF

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing Plaintiff's Amended Notice of Intention to Take Oral Deposition in Aid of Judgment, including Request for Production of Documents, has been forwarded, via facsimile, on this the 21st day of October, 2008, to Defendant's attorney of record:

Thomas G. Bousquet
9225 Katy Freeway, #103
Houston, Texas 77024
Facsimile (713) 827-0096

151

H. Miles Cohn